

DAVID BURCHARD,
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re

EDWARD PETER CAMPBELL

Debtor.

Case No.: 19-10509 DM

TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO MODIFY CHAPTER 13 PLAN

TO THE UNITED STATES BANKRUPTCY JUDGE, DEBTOR(S)' COUNSEL,
DEBTOR(S), AND OTHER PARTIES IN INTEREST:

David Burchard, Chapter 13 Trustee (“Trustee”), for the Santa Rosa and San Francisco Divisions of the United States Bankruptcy Court for the Northern District of California, hereby submits the following Objection to the Motion to Modify Chapter 13 Plan proposed by Debtor(s), filed on March 25, 2021. This objection is based upon all pleadings, papers and documents filed herein, together with those matters of which judicial notice has been requested, and any oral argument, which may be presented.

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1 The Trustee is unable to verify the basis for the motion to modify and Debtor's
2 substantial change in income and/or expenses without Debtor providing the following
3 information:

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5 X Updated Schedules I and J, utilizing the schedules effective December 2015.

6 X A signed copy of the debtor's filed 2019 Federal Income Tax Return

7 X Verification of income to substantiate change in plan payments in the form of
8 payment advices for the last 60 days. If the debtor does not receive payment
9 advices, the Trustee requests copies of bank statements for the last 2 months from
10 all bank accounts in which debtor is a signatory.

11 X Other:

12 (1) Payments proposed in the Motion to Modify and Modified Plan are not
13 sufficient to pay all claims in full. Trustee requests an amended motion and
14 plan.

15 (2) Trustee requests a filed declaration regarding the debtor's loss of disposable
16 income and how he/she has been affected by the National Health Emergency
17 as stated in the debtor's application to modify chapter 13 plan.

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19 Therefore, the Trustee requests that this objection be sustained, Debtor's Application to
20 Modify Chapter 13 Plan be denied, and other relief this Court deems proper.

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22 Dated: April 9, 2021

23 /s/ David Burchard
24 DAVID BURCHARD
25 CHAPTER 13 TRUSTEE
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